

## Section II (Remarks)

The claim amendments and the following remarks are submitted as a full and complete response to the July 7, 2009 Office Action.

Claims 1-3, 5-16, 18-21 and 28-30 have been cancelled, claims 17 and 22-24 have been amended, and new claims 31-42 have been introduced.

Support for the amendment of claims 17 and 22 to 24 can be found *inter alia* in the previously presented claims and in the description of the application. No new matter has been added.

Claims 31 to 42 have been added. Support for the new claims can be found *inter alia* in the in the previously presented claims and in the description of the application. No new matter has been added.

See the following remarks for a more complete discussion of the amended/added claims.

## Amendments to the Claims

The currently amended claim 17 is based on claim 17 as previously amended. In particular, the feature of “a step of updating, on a mobile station, at least one of a plurality of destination identifiers establishing the identity of one of a plurality of communication centers” has been added in the claim. Support can be found in the description, on page 10, 2<sup>nd</sup> paragraph:

**“In yet a further embodiment of the system, the customer 60 could use a mobile device, PDA, laptop computer, fixed line equipment or PCT or similar which is equipped with a graphical user interface (GUI). In this case, icons on the GUI are associated with services offered to the customer 60 and with reference numbers for the services. This information can be stored as entries, for example, in a flash memory component and can be periodically updated by means of an SMS, GPRS (General Packet Radio Services) or UMTS (Universal Mobile Telephone Services) data transfer.”**

The currently amended claim 22 is based on claim 22 as previously presented. The feature of

“the plurality of icons is associated with services offered by at least one of the plurality of communication centers” has been added to the claim. The feature of “an update system for periodically updating at least one of the plurality of icons and /or the plurality of destination identifiers by means of a data transfer” also has been added to the claim.

Support for these amendments can be found in former claim 24 and on page 10 2<sup>nd</sup> paragraph. See the preceding discussion.

The wording “destination number” has further been replaced by “destination identifier” in amended claim 22. The destination identifier is defined as the identifier for a communication center in the case of the call back service. The destination identifier may be a brand name, company name, products/services description, locations and/or requester identifiers. The destination identifier is used to identify the desired service, and the reference or destination numbers are the numbers of the professionals offering such service.

Claim 22 as previously pending related to “destination numbers”, the destination numbers being associated to the plurality of icons. Claim 23 as previously pending referred to the reference numbers associated to the destination numbers. The description of the mobile device with the GUI further teaches that the message to be sent includes a destination identifier and a reference number for the service.

The “destination number” of claim 22 as previously pending is the “destination identifier” of the call back system. Therefore, the term destination “identifier” is used in the claim for the purpose of consistency throughout the description and claims.

The currently amended claims 23 and 24 are based on the previously amended claims 23 and 24. The wording “destination number” has been replaced by the wording “destination identifier” as in claim 22.

New claims 31-42 have been added in the application.

New claim 31 relates to the updating of the icons, identifiers and/or reference numbers. Support

for the newly presented claim can be found in the present application, on page 10, 2<sup>nd</sup> paragraph, which reads:

**“Icons on the GUI are associated with services offered to the customer 60 and with reference numbers for the services. This information can be stored as entries, for example, in a flash memory component and can be periodically updated by means of an SMS, GPRS (General Packet Radio Services) or UMTS (Universal Mobile Telephone Services) data transfer”**

New claim 32 relates to the entries on the communications device and their updating system. Support for such new claim can be found in the present application, for example on page 10, 3<sup>rd</sup> paragraph, which reads:

**“Initially the entries are either dormant or enabled. When the customer 60 wishes to subscribe to one of the services, the customer 60 enables the service, for example by receipt of a data packet or by entry into the GUI, and the reference number for the service is added.”**

New independent claim 33 has been added, relating to a combination of a call-back system as per former claim 1 with a communication device as per claim 22.

New claims 34 to 42 relate to features of the call-back system. Support can be found in former claims 1-11 for such recited features.

### **Rejection of Claims Under 35 USC 103**

In the July 7, 2009 Office Action, claims 17-27 have been rejected under 35 USC 103(a) as being unpatentable over Wilson (EP 1 195 975, to Intelprop) in combination with Wildman (EP 1 168 791, to Netcall).

The other rejections in the July 7, 2009 Office Action, e.g., the rejection of claims 1-12 over Wilson in view of Wildman, the rejection of claims 13-16 over Wilson in view of Wildman, further in view of Gechter, and the rejection of claim 30 over Wilson in view of Wildman,

further in view of Hammond, are rendered moot by the cancellation of such claims herein.

Concerning the rejection of claims 17-27, the Office has noted that Wilson did not explicitly describe a connector which uses the destination identifier and the contact number to first attempt to automatically establish a first telephonic connection between the connector and a requested one of the plurality of communications centers and subsequently establish a second telephonic connection between the connector and the contact requester, thus establishing a complete connection between the contact requester and the requested one of the plurality of communication centers, wherein the establishment of the first telephonic connection and/or the establishment of the second telephonic connection between the connector and the contact requester is repeatable until the complete connection is established.

#### **Method Claim 17**

The method claim 17 has been amended to add that the feature that the method comprises “a step of updating, on a mobile station, at least one of a plurality of destination identifiers establishing the identity of one of a plurality of communication centers”.

The applicant has carefully studied the Office’s rejections and appertaining statements in the July 7, 2009 Office Action.

Claim 17 has been responsively amended to add further limitations. The applicant renews his positions as set out in the last response (filed June 2, 2009) that the claims 17-27 are not obvious as the ordinary skilled person would not have combined the teachings of Wilson with the teachings of Wildman in the manner suggested by the Office. The applicant further renews his position that even if the combination of the teachings of Wilson and Wildman et al. had been contemplated, then the combination of the teachings would lead to a hybrid system which would require five steps for establishing the communication, comprising the sending of one SMS by the user, one identification call from the call back handler to the user, and one call between the user and the destination.

The method of the present application, as recited in amended claim 17, now comprises a step of

updating, on a mobile station, at least one of a plurality of destination identifiers establishing the identity of one of a plurality of communication centers.

This was partly the subject-matter of former claim 24, and the updating process is also described in the present application, in particular with reference to mobile communications devices having GUI.

Previously pending claim 24 has been contended to be obvious by the Office. However, no arguments have been advanced in the July 7, 2009 Office Action as to why the update receiver would be obvious.

The applicant submits that the addition of the update feature to claim 17 renders the method recited in such amended claim non-obvious, against the disclosures of Wilson and Wildman.

Neither Wildman nor Wilson describes any update system, update receiver or even periodical update of information on the mobile device of the user requesting a call-back to be placed.

Wilson describes a dialling system, where a user places an SMS comprising a request for call connection to a telephone number using an identifier. The system performs a database look-up to obtain a telephone number which corresponds to the text identifier [0027]. Paragraph [0041] also teaches that the user may submit personalized entries to the system. However, no periodical updating is contemplated by Wilson, neither of the icons, nor of the destination numbers or the identifiers.

Wildman focuses on the method of call back handling from a call center, so that no updating is contemplated.

The further references cited against the now-cancelled claims 13-16 and 30 also fail to disclose or provide any derivative basis for any updating system.

Since the step of “updating, on a mobile station, at least one of a plurality of destination identifiers establishing the identity of one of a plurality of communication centers” is not

disclosed or suggested in any of the references cited in the July 7, 2009 Office Action, claim 17 as amended herein is patentably delineated over the art and in form and condition for allowance.

It therefore is requested that the rejection of claim 17 be withdrawn.

### **System Claim 22**

The Office has cited Figure 2 of Wilson as showing a mobile station MS1 capable of using a MAP protocol. According to the Office, it would be inherent or implicitly described in Wilson that the mobile device of Wilson would comprise a display device for displaying a graphical user interface, a first memory for storing a plurality of icons for display on said graphical user interface; and a second memory for storing a plurality of destination numbers associated with one or more the plurality of icons.

The Office considers that the mobile device would have or could have a GUI display to list text/icons, build a database of address book and contact list.

The Office further considers that the mobile device MS1 of the Wilson system has memory for storing telephone numbers and identifiers, as described in paragraphs [0013]-[0015] of the Wilson reference. The user sends a message comprising an identifier for a service and the system performs a look out in the database to obtain the telephone number associated with the identifier.

The applicant directs the Office's attention to the fact that Wilson does not explicitly describe the GUI functionality. With respect, the Applicant believes that the Office has analyzed the invention with the benefit of hindsight and therefore erroneously concluded that the application is obvious. The applicant renews his position, as stated in the previous responses, that the communications device of claim 22 is not obvious over the cited references.

In the interest of expediting prosecution, and advancing the application to allowance, however, the applicant has amended claim 22 so that it now further recites that the communications device includes "an update system for periodically updating at least one of the plurality of icons and/or the plurality of destination identifiers by means of a data transfer."

For corresponding reasons to those advanced hereinabove in support of the patentability of amended claim 17, the presence of such update system patentably differentiates the claimed communications device of claim 22 over the cited prior art.

It is correspondingly requested that the rejection of claim 22 be withdrawn, and that such claim be allowed.

Claims 23-27 are dependent on allowable claim 22 and therefore are also allowable.

It therefore is requested that the rejections of claims 22-27 be withdrawn.

Claims 31 and 32 newly added herein are each of dependent form under claim 22 (claim 31 depending directly from such claim 22, and claim 32 depending from claim 31 and thereby indirectly depending from claim 22). Such newly added claims 31 and 32 are therefore patentable over the art, for the same reasons as advanced in support of the patentability of claim 22.

### **System Claim 33**

Claim 33 has been newly added herein, and is of independent form, corresponding to a combination of the original claim 1 and current claim 22. The applicant therefore submits that claim 33 is allowable over the cited prior art for the same reasons as advanced hereinabove in support of the allowability of claim 22.

Claims 34-42 are dependent on claim 33, and are correspondingly allowable for the same reasons.

The claims as herein amended/added therefore require an update system or method that finds no basis, expressly, impliedly or extrapolatively, in the cited references. It therefore is requested that all pending claims 17, 22-27 and 31-42 be acknowledged as patentable, by issue of a corresponding Notice of Allowance for this application.

**Fee Payable for Added Claims 31-42**

In connection with the cancellation herein of claims 1-3, 5-16, 18-21 and 28-30, the addition of new claims 31-42 herein entails no net addition of independent claims or total claims, beyond the respective numbers for which payment was previously made.

Accordingly, no added claims fees are due.

Nonetheless, if for any reason it is determined that any fees or amounts are payable for the filing and entry of this response, the same hereby are authorized to be charged to Deposit Account No. 08-3284 of Intellectual Property/Technology Law.

**Petition for Three Months Extension Time**

Petition hereby is made under the provisions of 37 CFR 1.136 for a three months extension of time for response to the July 7, 2009 Office Action. The fee of \$555 specified in 37 CFR 1.17(a)(3) is being paid by on-line credit card authorization at the time of EFS filing of this response.

Authorization also is hereby given to charge the amount of any additional fee or amount, to Deposit Account No. 08-3284 of Intellectual Property/Technology Law.

**CONCLUSION**

Based on the foregoing, all of Applicants' pending claims 17, 22-27 and 31-42 are patentably distinguished over the art, and in form and condition for allowance. The examiner is requested to favorably consider the foregoing, and to responsively issue a Notice of Allowance. If any issues require further resolution, the examiner is requested to contact the undersigned attorney at (919) 419-9350 to discuss same, in order that this application can be passed to issue, at an early date.

Respectfully submitted,

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